

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF EASTERN NEW YORK**

MARTIN JONATHAN BATALLA VIDAL,  
ANTONIO ALARCON, ELIANA FERNANDEZ,  
CARLOS VARGAS, MARIANO  
MONDRAGON, and CAROLINA FUNG FENG,  
on behalf of themselves and all other similarly  
situated individuals, and MAKE THE ROAD  
NEW YORK, on behalf of itself, its members, its  
clients, and all similarly situated individuals.

*Plaintiffs,*

v.

KIRSTJEN M. NIELSEN, Secretary of the  
Department of Homeland Security, JEFFERSON  
BEAUREGARD SESSIONS III, Attorney General  
of the United States, and DONALD J. TRUMP,  
President of the United States,

*Defendants.*

Case No. 1:16-cv-04756 (NGG) (JO)

**MOTION TO WITHDRAW AS  
COUNSEL**

**MOTION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE THAT counsel for Plaintiffs hereby moves the Court for an Order, pursuant to Local Rule 1.4 to allow Justin B. Cox to withdraw as counsel of record for Plaintiffs in this matter as his employment with the National Immigration Law Center has concluded.

WHEREFORE, the undersigned counsel respectfully requests this Honorable Court enter an Order granting the motion to withdraw. A proposed order is attached.

Dated: October 24, 2018

Respectfully submitted,

/s/ Joshua Rosenthal  
Joshua Rosenthal (*pro hac vice*)  
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*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2018 I electronically filed the foregoing Motion to Permit Withdrawal of Counsel and [Proposed] Order granting the same with the Clerk of the Court for the United States District Court for the Eastern District of New York by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Joshua Rosenthal  
Joshua Rosenthal (pro hac vice)